



To: EPA imports group

Attn: David C. Hurlin

(734) 214-4098

From: VIA Motors Inc.

165 Mountain Way Dr.

Orem, UT 84058

Dear Mr. Hurlin or designee,

VIA Motors has purchased quantity 1 light duty (3080 lbs) small truck for our research and testing purposes. The vehicle is a new standard product from Ashok Leyland of India. To our knowledge there is not a pre-existing certificate of conformity that we would be able to cite for import purpose.

As VIA motors' mission is to electrify fleet delivery transportation and thereby improve emissions and air quality, I would like to inform you of our plans for the vehicle.

This vehicle will be shipped via

Ex. 4 CBI

Ex. 4 CBI

The vehicle description and VIN number is as follows:

1 Unit of brand new Phoenix Glider LHD-LX FSD

Without engine, transmission, fuel or exhaust system

Color: 1 white

- VIN : **Ex. 6 Personal Privacy (PP)**
- Manufacture Date (Month/year): December / 2020
- Make: Ashok Leyland

This vehicle is currently located at Ashok Leyland's facility (NO. 1, SARDAR PATEL ROAD GUINDY, CHENNAI INDIA) prior to shipment.

If an exemption is unnecessary because of the deletion of engine and fuel components, we would appreciate correspondence clarifying that. Otherwise, we would like a testing exemption and therefore would like to describe the planned test program.

1)

Ex. 4 CBI



- 2) VIA asserts that the test program cannot be executed without the testing exemption. This is because the vehicle is not certified or imported for sale in the United States. Further, because the engines and fuel system will be removed prior to delivery, it is not reasonable to try to have the vehicles emissions tested at time of import.
- 3) The VIA test program is anticipated to be an effort of no more than 18 months and involving just one vehicle
 - a. The model year for this vehicle is 2020 and the GVWR 5290 lbs
 - b.

Ex. 4 CBI
- 4) The VIA test program is well controlled for the purpose of evaluating the trucks for electric vehicle donors or gliders
 - a. Technical tests will determine

Ex. 4 CBI

- b. The testing will be on site and on nearby roadways at VIA Motors facility 165 Mountain Way Dr. Orem Utah, 84058
- c. Total mileage anticipated during test phase for the vehicle is anticipated at about 300 miles 100% of which will be in battery electric mode.
- d. VIA will own the vehicles
- e. The intended final disposition of the vehicles will be use as warehouse transfer/logistic vehicles on VIA private facility and/or scrap.
- f. The vehicle VIN number is affixed to the vehicle. This VINs is used to track the vehicle in VIA's inventory for the full life.
- g. Test results will be recorded in VIA's engineering product data management (EPDM) system. The VIA system records essentially all engineering, design, and test data about each electric vehicle and donor research program that VIA undertakes.

Ex. 6 Personal Privacy (PP)

VIA Motors Program Manager

Ex. 6 Personal Privacy (PP)

Hurlin, David

From: Ex. 6 Personal Privacy (PP)
Sent: Tuesday, January 19, 2021 10:35 AM
To: Imports
Cc: Ex. 6 Personal Privacy (PP)
Subject: VIA Motors letter regarding single truck import without engine
Attachments: EPA Letter Ashok Phoenix VIA Test Program signed.pdf

Dear Mr. Hurlin,

Attached for your review please find our letter regarding a qty 1. Truck we intend to import without engine or fuel components.

Ex. 4 CBI

Ex. 4 CBI We are grateful for the assistance and do not hesitate to call or e-mail me for any clarification or question regarding these matters.

Kind regards,

Ex. 6 Personal Privacy (PP)